

**RESHMA KAMATH**

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*IN PROPRIA PERSONA*

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA**

**Case Number: 3:23-CV-3531-JSC**

**RESHMA KAMATH,**

**Plaintiff,**

**v.**

**SAN FRANCISCO POLICE  
DEPARTMENT (SFPD); UNITED  
STATES DEPARTMENT OF  
HOMELAND SECURITY; FEDERAL  
PROTECTIVE SERVICES; STEVE  
GLUMAS; SECURITY GUARD # 1,  
SECURITY GUARD # 2; AND DOES  
1-10, INCLUSIVE,**

**Defendants.**

**VERIFIED FIRST-AMENDED  
COMPLAINT FOR DAMAGES:**

- 1. 42 U.S. Code § 1983 - Civil action  
for deprivation of rights;**
- 2. CONVERSION;**
- 3. CIVIL ASSAULT.**

**DEMAND FOR JURY TRIAL**

**FIRST-AMENDED COMPLAINT**



**RESHMA KAMATH**  
ATTORNEY AT LAW

**FIRST-AMENDED COMPLAINT**

**INTRODUCTION**

1. In addition to Defendant SFPD's utter failure to meet-and-confer prior to filing a FRCP 12(b)(6) motion in the prior round, Defendant SFPD and the Court in unison - have completely made a mockery of justice.

2. The country falls a little more into the rabbit-hole of nothingness when such prejudicial orders come out – with no facts to support its faulty reasoning.

3. Plaintiff objects to the substitution of City and County of SF in lieu of Defendant SFPD. Since the City/County are not proper parties, Plaintiff will continue to sue the Defendant SFPD in order to avoid duplication.

4. Further, Plaintiff states that the court in its prior order (as usual as White judges do) portrayed this as a “selective enforcement claim” and against a race/gender theory.

5. What the Court failed to do in its previous order is to understand and apply *Monell* liability appropriately – maybe because the Court doesn't understand how *Monell* works.

6. *Firstly*, the court order does a recitation of the law devoid of facts stated in the Complaint (pages 4,5 in ECF Dkt. No. 54) and thereafter in subsequent filings.

7. *Secondly*, the court order fails to check plausible facts in the Complaint, i.e., where the car was parked on 450 Golden Gate Ave., San Francisco, California,

1 94102, outside the federal Phillip Burton building. Plaintiff even produced pictures  
2 in the subsequent pleadings. A true and correct set of pictures is attached hereto and  
3 incorporated via reference herein in **EXHIBIT A and B**.

4  
5 8. Yet, the court order falsely states, “Plaintiff does not allege where the vehicle  
6 was parked or even that it was lawfully parked at the time of the incidents.” (pages  
7 5, lines 17-18, ECF Dkt. NO. 54). The complaint reiterates where the car was parked  
8 and pictures speak for themselves.

9  
10 9. Then, *thirdly*, the obviously-racist court-order in ECF Dkt. NO. 54 goes on to  
11 say more falsified allegations, i.e., “Plaintiff has sufficiently alleged that only her car  
12 was towed that day and there is no other explanation of why it was towed except in  
13 that no other vehicle was towed on that day.”

14  
15 10. Such of court’s circular statements in its prior order: that they are sufficient  
16 allegations, and in the next sentence, there is no other explanation, this is  
17 contradictory from the court to say the least.

18  
19 11. Moreover, when there was no other explanation in the prior complaint– that  
20 means there is **discriminatory intent and discriminatory effect**.

21  
22 12. When there is no race-neutral and gender-neutral explanation for ticketing and  
23 towing only of plaintiff’s car versus no other cars– which means Defendants acted in  
24 racist and gender-based discrimination.  
25  
26  
27  
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1 13. *Fourthly*, such facts are discovered during the discovery stage, not the  
2 plausibility of the complaint stage under FRCP 8(A).

3 14. This is just plain ol' White racism. White judges' self-fulfilling belief that  
4 they're infallible and above everyone – that they understand everyone and  
5 everything around them. But in reality, they're condescending, demeaning, and  
6 racist.  
7

8 15. *Fifthly*, the court goes on to make more blatantly racist and borderline idiotic  
9 statements: "Likewise, although Plaintiff alleges she was targeted based on her race,  
10 ethnicity, and gender because she observed other vehicles similarly parked which  
11 were not ticketed, she does not allege the race, ethnicity, or gender of the  
12 owners/operators of those unticketed vehicles." (pg. 5, lines 22-25, ECF. Dkt. No.  
13 54). The reason this touches upon stupidity is that the owners/operators of the  
14 unticketed vehicles are not sitting there – they have parked their cars in front of the  
15 450 Golden Gate Ave., SF, CA building in an area with no signs of no parking, no  
16 reclamation sign on any sign, with a tree blocking any signage on a parallel street,  
17 and no red curb. The Defendants and the court in its failure ignore all that and turn a  
18 blind eye.  
19  
20  
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22

23 16. *Sixthly*, the Court goes on to make more assumptions and legally conclusory  
24 remarks stating somehow the court knows the only reason the ticket was issued was  
25 "illegally parked." Borderline racist and assumptive remarks from the White judicial  
26  
27  
28

1 officer of the court. As usual, the court should remain confused and scratch its racist  
2 head on why this is selective enforcement and discrimination. Rather, the court  
3 should think from a rational and logical perspective – which the court has utterly  
4 failed to do in its biased/prejudicial ruling.  
5

6 17. If the court understands constitutional law (which clearly the court doesn't  
7 based on its prior rulings), if one is treated differently than others similarly-situated,  
8 that is sufficient to raise a 42 U.S.C. 1983 discrimination claim. It does not have to  
9 be based on race and/or gender only.  
10

11 18. Finally, this action seeks monetary damages because of the Defendants'  
12 participation in the wrongful deprivation of a private person, particularly Plaintiff's  
13 property; and, where Defendants had engaged in selective enforcement/  
14 discrimination towards Plaintiff. The reason for solely seeking monetary damages is  
15 injunctive relief would be moot. And, that is the only way to make Plaintiff whole  
16 again.  
17

### 18 **VENUE & JURISDICTION**

19  
20  
21 19. This Court has jurisdiction over Plaintiff's federal claim under 28 U.S.C. §§  
22 1331 and 1343. The Court has supplemental jurisdiction over Plaintiff's claims,  
23 which are based on state law, under 28 U.S.C. § 1367.  
24  
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20. Venue in the United States District Court for the United States District Court Northern District of California San Francisco Division is proper pursuant to 28 U.S.C. § 1391.

21. Plaintiff alleges that all of the Defendants acted under color of state law and violated Plaintiff's rights under the Fourth and Fourteenth Amendments to the United States Constitution.

22. Plaintiff also brings state law claims for second and third claims for relief pursuant to this Court's supplemental jurisdiction.

### **PARTIES**

23. Plaintiff is Reshma Kamath, a natural person residing in the United States, particularly in Arizona, and in California. For work purposes, Plaintiff is sometimes at 450 Golden Gate Ave., San Francisco, California, Phillip Burton building. ("subject-incident address.")

24. Defendant is the San Francisco Police Department at or near subject-incident address.

25. Defendant is the United States Department of Homeland Security at subject-incident address.

26. Defendant is the Federal Protective Services housed in the United States DHS of the San Francisco federal court at subject-incident address.

27. Defendant is Steve Glumas employed at subject-incident address.

1 28. Defendant is police officer/security guard #1 John Doe, male, Filipino, short,  
2 bald and fat, at subject-incident address.

3 29. Defendant is police officer/security guard # 2 John Doe, male, Nigerian, with  
4 tattoos, at subject-incident address.

5  
6 **FACTUAL ALLEGATIONS**

7 30. In the year 2020, Plaintiff purchased a BMW 750 LI for personal and  
8 professional use. As a result of this transaction, Plaintiff became the owner of the  
9 vehicle.  
10

11 31. The title, registration, and insurance of the vehicle were (and are) current at  
12 the time of Defendants' deprivation.  
13

14 32. From May and July 2023, Defendants had engaged in selective enforcement,  
15 discrimination and harassment towards Plaintiff - particularly Defendants Glumas,  
16 security guards # 1 and # 2.  
17

18 33. Between May and July 2023 on-going, Defendants SFPD and DHS FPS,  
19 particularly Defendants Glumas, security guards # 1 and # 2, have repeatedly given  
20 falsified tickets, to Plaintiff, atleast three (3) in total, and subsequently towed  
21 Plaintiff's vehicle. No other vehicle was ticketed at each of the times during the  
22 same time that Plaintiff's vehicle was parked at the subject address depicted in  
23 **Exhibits A and B. None of the windshields have a ticket displayed and no**  
24 **special permit stuck on the windshield.**  
25  
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1 34. **This phenomenon continued even after the initiation of this complaint**  
2 **all other vehicles freely parked in the subject-incident address with no tickets**  
3 **and no special permits. Definitely not towed.**

4  
5 35. During the stated-time, May-July 2023, several other cars and vehicles were  
6 parked on the same street at subject-incident address around Plaintiff's vehicle; and  
7 yet, not one of the other vehicles and cars had any tickets on them during each of the  
8 falsified ticket incidents by Defendants.

9  
10 36. Plaintiff took videos and photographs of the other vehicles and cars to show  
11 that none of the similarly-situated cars/vehicles parked in the same zone and same  
12 road across from, behind, and adjacent from Plaintiff's vehicle had any tickets on  
13 them during each of the falsified ticket incidents.

14  
15 37. It cannot be that this idiotic court thinks that the car was illegally parked, but  
16 then thinks all the other cars parked in the same place are legally parked. It is one or  
17 the other, cannot be both. None of them had special permits or certifications to park  
18 there.

19  
20  
21 38. None of the other car drivers and passengers were Indians/Indian-Americans/  
22 and/or from Hindu culture.

23  
24 39. From naked eye observation, the other similarly-situated car parkers were  
25 White or Latin-Americans. Some had no one sitting in the car and the cars were  
26 parked for hours. There was no towing.



1 40. Between May and July 2023 on-going, Defendants SFPD and DHS FPS,  
2 particularly Defendant Glumas, security guards # 1 and # 2 have repeatedly given  
3 falsified tickets, to Plaintiff, atleast three (3) in total and towed Plaintiff's vehicle;  
4 while SFPD and DHS FPS did not give any tickets to the cars around the Plaintiff's  
5 vehicle. **See EXHIBIT A AND B with cars having no tickets and no special**  
6 **permits displayed on the windshield or otherwise.**  
7

8  
9 41. Between May and July 2023 on-going, Defendants SFPD and DHS FPS have  
10 repeatedly given falsified tickets, to Plaintiff, three (3) in total and towed Plaintiff's  
11 vehicle; while Defendants SFPD and DHS FPS, each of them working in tandem,  
12 have not towed any other cars and vehicles at the exact same place where Plaintiff's  
13 vehicle was lawfully parked.  
14

15 42. When Plaintiff saw the ticket in May 2023 from SFPD, it stated, "parking  
16 restriction."  
17

18 43. However, Plaintiffs have seen several cars parked at the exact same incident  
19 address, same parking spot, with no tickets and no special permits, on numerous  
20 other days.  
21

22 44. On the same days, as seen in Exhibits A and B, even across the street, cars  
23 were parked with no tickets and no special permits, on numerous other days.  
24  
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1 45. Then, Plaintiff decided to park her vehicle in the same location the next time  
2 Plaintiff is there to see whether Defendants will engage in repeated patterns of  
3 selective enforcement and discrimination.  
4

5 46. Defendants did just that. Defendants had intentionally engaged in repeated  
6 patterns of selective enforcement and discrimination towards Plaintiff.  
7

8 47. When Plaintiff saw the second and third tickets in June-July 2023 from SFPD,  
9 it stated federal violation (July 10, 2023), and tow-away zone (July 11, 2023).

10 However, on the same days, Plaintiff has seen several cars in the same zone parked  
11 right behind and in front of Plaintiff's vehicle with no ticket from Defendants. On  
12 the same days, even across the street, any and all of the other cars parked in the same  
13 zone had no tickets from Defendants.  
14

15 48. Thus, it was clear that Defendants were engaging in selective enforcement  
16 towards Plaintiff.  
17

18 49. On July 11, 2023, the day of the second ticket, when Plaintiff was walking  
19 from her work address to Plaintiff's vehicle, Plaintiff saw the Defendants' agents  
20 watching her walk to her vehicle.  
21

22 50. On July 12, 2023, the day of the second ticket, when Plaintiff was unlocked  
23 her vehicle and started to drive, Plaintiff saw the Defendants' agent suddenly drove  
24 up to and next to Plaintiff's vehicle.  
25  
26  
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1 51. The day of the tow-away on July 13, 2023, Plaintiff had decided to park her  
2 vehicle in the same location (no red curb, no signage, tons of other cars parked on  
3 that exact street) to see whether Defendants would engage in one more repeated  
4 pattern of selective enforcement and discrimination.  
5

6 52. Defendants did just that. Defendants intentionally engaged in repeated  
7 patterns of selective enforcement and discrimination towards Plaintiff.  
8

9 53. Defendants were scanning the license plate, and checking the name of the  
10 person to whom the vehicle belongs to; and, when they saw Reshma Kamath having  
11 ownership, the Defendants intentionally and invidiously only gave a ticket to  
12 Reshma Kamath based on her race, ethnicity and gender.  
13

14 54. Reshma Kamath is Indian-American, Asian, and is a woman of color.  
15

16 55. From May and July 2023 on-going, Defendants SFPD and DHS FPS may  
17 argue discretion; however, they have manifested their actions, and omissions, as  
18 selective enforcement.  
19

20 56. From May and July 2023 on-going, Defendants SFPD and DHS FPS may  
21 argue discretion; however, they have manifested omissions, as selective  
22 enforcement.  
23

24 57. From May and July 2023 on-going, Defendants SFPD and DHS FPS may  
25 argue discretion; however, they were acting under color of state and federal law.  
26  
27  
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1 58. From May and July 2023 on-going, SFPD and DHS FPS, have scanned the  
2 license plate of Plaintiff's vehicle, and saw that her name was Reshma Kamath; and  
3 thereby, only given tickets to Plaintiff.  
4

5 59. There is a video camera pointing to the street on 450 Golden Gate Ave., San  
6 Francisco, California that Plaintiff intends to subpoena.  
7

8 60. On July 12, 2023, agents of Defendants SFPD and DHS FPS started their car  
9 at the same time that Plaintiff got into her car.

10 61. The agents, Defendants, security guards #1 and #2, were literally next to  
11 Plaintiff's car when she was in her vehicle. They had waited for Plaintiff to approach  
12 her vehicle, and then driven up next to her to observe who she was. When Plaintiff  
13 made eye contact with them, they kept staring and almost blocked Plaintiff's  
14 ingress/egress from the vehicle in the spot where Plaintiff was parked.  
15  
16

17 62. Clear racist misogyny from Defendants, security guards #1 and #2.

18 63. Plaintiff recognized the officer closest to Plaintiff's vehicle was an officer  
19 who was bald.  
20

21 64. The next day, the same officer appeared to not only tow Plaintiff's vehicle,  
22 but also to **not** release her vehicle to her and slam the door while he was yelling at  
23 Plaintiff. Plaintiff has the video.  
24  
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27  
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1 65. On July 13, 2023, on-going, Defendants, SFPD and DHS FPS, i.e., security  
2 guards #1 and #2, may argue discretion; however, they have manifested their  
3 actions, and lack thereof, as selective enforcement.  
4

5 66. Plaintiff even requested from Defendant Glumas whether there was a legal  
6 unit there to discuss the issue.  
7

8 67. Plaintiff has a video of Defendants, security guards #1 and #2, yelling, and  
9 slamming the door on her outside SFPD and DHS FPS office at the subject incident  
10 building, as well as, not allowing Plaintiff to sign the papers to release her vehicle  
11 when Plaintiff had requested the release.  
12

13 68. Plaintiff felt physically intimidated by the presence of Defendants' agents.  
14

15 69. None of the Defendants afforded Plaintiff an opportunity to be heard prior to  
16 the deprivation of the vehicle.  
17

18 70. The seizure of Plaintiff's vehicle was unreasonable.  
19

20 71. Defendants' agents stated to Plaintiff that the officer who has the alleged  
21 "release form" for her vehicle was "gone for the day."  
22

23 72. As a proximate result of Defendants' actions, Plaintiff was deprived of her  
24 vehicle, has incurred expenses for alternate transportation, and has suffered extreme  
25 embarrassment, shame, and mental distress.  
26

27 73. To the date of her filing, Plaintiff does not have her property, Plaintiff's  
28 vehicle with her.

1 74. Plaintiff had several errands to run after winning her jury trial on July 13,  
2 2023; and because of Defendants' conduct and omissions, Plaintiff was deprived on  
3 July 14, 2023, and thereafter, from performing those work-related errands.  
4

5 **CLAIMS FOR RELIEF**

6 **FIRST CLAIM OF RELIEF**

7 **42 U.S. Code § 1983 - Civil action for deprivation of rights**

8  
9 75. Plaintiff hereby incorporates the preceding allegations as if fully rewritten  
10 herein.

11 76. Defendants at all times relevant to this action were acting under color of state  
12 and federal law.

13  
14 77. Defendants unlawfully deprived Plaintiff of her property without due process  
15 of law in violation of the Fourteenth Amendment to the Constitution of the United  
16 States.  
17

18 78. Defendants made an unreasonable and warrantless seizure of Plaintiff's  
19 vehicle at subject-incident address in violation of the Fourth Amendment to the  
20 United States Constitution.  
21

22 79. Defendants were scanning the license plate, and checking the name of the  
23 person to whom the vehicle belongs to; and, when they saw Reshma Kamath having  
24 ownership, the Defendants intentionally and invidiously only gave a ticket to  
25  
26  
27  
28

1 Reshma Kamath based on her race, ethnicity and gender, i.e., Reshma Kamath is  
2 Indian-American, Asian, and is a woman of color.

3 80. In addition to this, as a race-based and gender-based discrimination, (i) the  
4 other similarly-situated vehicles had individuals parked in the exact same subject-  
5 incident address; (ii) were not Indian/Asian; (iii) the other similarly-situated vehicles  
6 had individuals who were White or Latin-Americans; (iv) the other similarly-  
7 situated vehicles had individuals who were mostly male; and, (v) the other similarly-  
8 situated vehicles had individuals who were neither ticketed nor towed.

9 81. Further, same subject-incident address had (i) no red curb, (ii) no signage, and  
10 (iii) plenty of other similarly-situated vehicles parked in the exact same parking spot  
11 at the exact same subject-incident address of Plaintiff's car. See **EXHIBITS A, B.**

12 82. Moreover, there is a tree blocking a tow-away sign on the parallel street with  
13 yet another sign blocking that sign on the parallel street.

14 83. Parallel street would be perpendicular to the subject-incident address. Thus,  
15 neither the sign is visible, nor is there any marking where Plaintiff's car was parked.

16 84. Perpetrators-Defendants Glumas, security guard officers # 1 and 2 were all  
17 male. In fact, there is no woman who works as a security guard at the subject-  
18 incident ingress and egress on the Turk Street location when Plaintiff was there.

19 85. Defendants Glumas, security guard officers # 1 and 2 were non-white  
20 presumed, and not of them was Indian/Indian-American.

86. Defendants engaged in selective enforcement and discrimination.

87. When there is no other explanation– that means there is **discriminatory intent and discriminatory effect**.

88. When there is no race-neutral and gender-neutral explanation for ticketing and towing only of plaintiff's car versus no other cars– which means Defendants acted in racist and gender-based discrimination.

89. Defendants must produce evidence that they ticketed and towed other similarly-situated cars on the stated days – near Plaintiff's car, and/or at the same location.

90. Defendants' agents were male and non-Indian based on Plaintiff's personal knowledge.

91. Defendants also delayed returning Plaintiff's car to her making excuses that the select personnel was not there.

92. Defendants, particularly security officers # 1 and 2, and Steve Glumas delayed returning Plaintiff's car to her making excuses that the select personnel was not there.

93. As a result, Plaintiff incurred costs.

94. At all times relevant hereto, Defendants acted pursuant to a policy and/or custom of Defendants without court order and without providing an opportunity to



1 be heard under due process of the Fifth Amendment of the United States  
2 Constitution.

3 95. Defendants violated the Fourth and Fourteenth Amendment of the United  
4 States Constitution.  
5

6 96. If leave to amend is further granted, Plaintiff would like to parse each of the  
7 constitutional violations into a separate cause of action.  
8

9 **SECOND CLAIM OF RELIEF**

10 **CONVERSION**

11 97. Plaintiff hereby incorporates the preceding allegations as if fully rewritten  
12 herein.  
13

14 98. The property was Plaintiff's vehicle.

15 99. Without Plaintiff's consent, from July 13, 2023 on-going, Defendants  
16 negligently, and intentionally deprived Plaintiff of her rightful possession of  
17 Plaintiff's vehicle.  
18

19 100. Plaintiff went to the office of the DHS FPS, and was informed they will not  
20 release her vehicle, because the officer with the release form were not there.  
21

22 101. Plaintiff had ownership and/or right to possession of property.

23 102. Defendant's wrongful act toward and/or disposition of the property, such as  
24 selective enforcement and discrimination to Plaintiff, interfering with plaintiff's  
25 possession; and damage to plaintiff.  
26  
27  
28

103. However, the two officers who were speaking to Plaintiff were from the prior day in the car next to Plaintiff's vehicle; and, they walked up to Plaintiff knowing they "knew" the Plaintiff.

104. At all times relevant hereto, Defendants acted with malice, recklessness and total and deliberate disregard for the contractual and personal rights of Plaintiff.

### **THIRD CLAIM OF RELIEF**

#### **CIVIL ASSAULT**

105. Plaintiff hereby incorporates the preceding allegations as if fully rewritten herein.

106. Defendants security guards # 1 and 2 at the SFPD/DHS location working for Defendants SFPD and DHS FPS created a reasonable apprehension of physical and bodily harm to Plaintiff in the conduct of Defendants' agents on July 13, 2023 after 3 p.m. PT.

107. Defendants security guards # 1 and 2 at the SFPD/DHS location - were yelling and screaming that was captured in a video.

108. Thus, Plaintiff had fear and apprehension of lack of her safety and her bodily harm based on Defendants' conduct on July 13, 2023 after 3 p.m. PT.

109. Based on this, Defendants committed a civil assault upon Plaintiff.

///

///

**PRAYER FOR RELIEF**

- a. A judgment in favor of Plaintiff for \$10.50 million in damages inclusive of repairs to the damages to the car from tow-away and related;
- b. Actual, general, special and punitive damages in an amount to be determined at trial;
- c. A judgment for compensatory and expectancy damages in an amount to be determined at trial, plus reasonable attorneys' fees pursuant to 42 U.S.C. § 1988, against all Defendants;
- d. A judgment for compensatory and punitive damages in an amount to be determined at trial;
- e. A jury trial on all appropriate issues;
- f. An award of costs and expenses against the Defendants; and,
- g. Any and all other relief this Court may deem appropriate.

*Sincerely,*

**DATED: APRIL 30, 2024**

**RESHMA KAMATH**

*/s/ Reshma Kamath*

Plaintiff, *In Propria Persona*

**VERIFICATION**

I, RESHMA KAMATH, am plaintiff in the above-stated matter. I have read the

**VERIFIED FIRST-AMENDED COMPLAINT FOR DAMAGES:**

**1. 42 U.S. Code § 1983 - Civil action for deprivation of rights;**

**2. CONVERSION;**

**3. CIVIL ASSAULT.**

and know the contents thereof. The matters stated therein are true of my own knowledge, except as to those matters that are therein stated on information and belief, and concerning those matters, I believe them to be true.

I declare under penalty of perjury under the laws of the State of California and the United States of America that the foregoing is true and correct.

///

**DATED: APRIL 30, 2024**

**RESHMA KAMATH**

*/s/ Reshma Kamath*

Plaintiff, *In Propria Persona*

**PROOF OF SERVICE**

F.R.C.P. 5 / C.C.P. § 1013(a)(3), C.C.P. § 1010.6(a)(6) / Cal. R. Ct. R. 2.260

I am employed in the County of San Mateo, California. I am over the age of 18, and not a party to this action. My mailing address is: 700 El Camino Real, Suite 120, #1084, Menlo Park, California 94025, and my e-mail address is reshmakamath2021@gmail.com for electronic-service. On May 01, 2024, I served the document(s) on: SEE ATTACHED SERVICE LIST.

**VERIFIED FIRST-AMENDED COMPLAINT FOR DAMAGES:**

**1. 42 U.S. Code § 1983 - Civil action for deprivation of rights;**

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**PROOF OF SERVICE.**

**VIA ELECTRONIC SERVICE:** In electronically transmitting courtesy copies of the document(s) listed above to the email address(es) of the person(s) set forth on the attached service list. To my knowledge, the transmission was reported as complete and without error, as per the electronic service agreement between all parties and their attorneys of record, herein.

I declare under penalty of perjury under the laws of the State of California and the United States of America that the foregoing is true and correct. Executed on May 01, 2024.

**SERVICE LIST**

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